

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MELISSA KAYE,

PLAINTIFF,

-against-

NEW YORK CITY HEALTH AND HOSPITALS CORPORATION;  
ABHISHEK JAIN; ELIZABETH FORD; JONATHAN WANGEL and  
PATRICIA YANG, (in their official and individual capacities and as  
aiders and abettors)

**PLAINTIFF'S**  
**COUNTERSTATEMENT OF**  
**DISPUTED FACTS**

18-12137(JPC)(JLC)

DEFENDANTS.

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Pursuant to Fed. R. Civ. P. 56 and Local Rule 56.1, Plaintiff Melissa Kaye, M.D. ("Plaintiff" or "Dr. Kaye"), submits this "Counterstatement of Disputed Facts," in opposition to the Motion for Summary Judgment that was filed by Defendants: New York City Health and Hospitals Corporation (H +H)/Correctional Health Services (CHS); Abhishek Jain, M.D. (Dr. Jain); Elizabeth Ford (Dr. Ford); Jonathan Wangel (Wangel); and Patricia Yang (Yang)

**I. Background**

**A. Dr. Kaye's Background**

1. Throughout the course of her employment, Dr. Kaye was more qualified than Dr. Steve Ciric and the other male Directors of the Forensic Psychiatric Court Clinics. Dr. obtained her medical degree from the Medical College of Pennsylvania. She is a triple board certified Psychiatrist with certifications in the following specialties: General Psychiatry; Forensic Psychiatry; and Child & Adolescent Psychiatry. She had more directly applicable experience in Court Ordered forensic psychiatric evaluations, she had the most seniority of all of the evaluators and directors at the clinic.
  - **Exhibit 1: Dr. Kaye's CV NYC2541-NYC2544; and**
  - **Exhibit 2: Dr. Kaye's Decl. ¶**